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**UNITED STATES DISTRICT COURT**  
**CENTRAL DISTRICT OF CALIFORNIA**

FITNESS INTERNATIONAL, LLC

Plaintiff,

-vs-

LEAH ALSPAUGH and DOES 1  
through 50, inclusive,

Defendant.

Case No.: 8:22-CV-01800-DOC-DFM

**FITNESS INTERNATIONAL, LLC'S**  
**THIRD SUPPLEMENTAL**  
**MEMORANDUM RE: LEAH**  
**ALSPAUGH'S CONTINUING**  
**VIOLATION OF THE COURT'S**  
**PERMANENT INJUNCTION**

1 Plaintiff FITNESS INTERNATIONAL, LLC (hereinafter “Fitness”) respectfully  
 2 submits the following further supplemental memorandum regarding defendant LEAH  
 3 ALSPAUGH’s (hereinafter “Alspaugh”) continuing violation of the Permanent  
 4 Injunction entered by this Court on May 8, 2023. [Dkt. 81.] Alspaugh’s conduct is now  
 5 criminal in nature, and is now a clear threat to the safety of Fitness’ personnel and  
 6 members.

7 One of the most disturbing events to date occurred on November 6, 2023, when  
 8 Alspaugh went to LA Fitness’ La Habra LA, walked immediately behind the front desk,  
 9 opened up a cabinet, and **grabbed a set of keys**. When Fitness’ Operations Manager  
 10 Ernest Roque saw what she was doing, he attempted to grab the keys back, and tug of  
 11 war ensued, culminating with **Alspaugh striking Mr. Roque on the head** in order to  
 12 get him to let go of her arm. After Mr. Roque let go of her arm, Alspaugh – still in  
 13 possession of the keys – left. The police were called, however Fitness is now forced to  
 14 change the locks to the gym for the safety and security of its employees and members.  
 15 Below is a link to the November 6, 2023 surveillance video:

16 <https://yokasmith.sharefile.com/d-s8060428264274759817c44a537867133>

17  
 18 [Stokesberry Decl., at ¶2.]

19 This was actually Alspaugh’s second trip to the La Habra location in November.  
 20 She was there on November 2, 2023, when she asked the staff if the “back room was  
 21 ready” for her. She stated that she was the owner of the building, the owner of the  
 22 company, and that she pays for everything in the building except the “ugly turf.” She  
 23 spoke with Mr. Roque, and asked him “why the f\*\*k is that employee working here.”  
 24 When Mr. Roque realized who she was, he asked her to leave. Alspaugh refused to leave  
 25 and repeatedly threatened to “kick his ass,” and stated she would not leave. The police  
 26 were called, however Alspaugh left before they arrived. [Stokesberry Decl., at ¶3.]

27 Alspaugh also continues to harass Fitness’ Vice President of Human Resources,  
 28 Mindy Stokesberry, by email. On November 5, 2023, at 6:43 a.m., Alspaugh sent an

1 incomprehensible email to Ms. Stokesberry which states in pertinent part: “I have the  
2 suit from Xing wen wen synchronized swimmer royal blue gold that I bought for 3800  
3 from the hut club. It is not a swap meet item. I am posting it vintage for 1000000. It’s  
4 a dry suit never been worn.” [Stokesberry Decl., at ¶4, and **Exhibit A** thereto.]

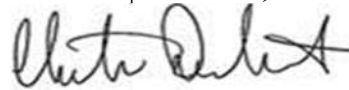
5 On November 7, 2023, Alspaugh sent another email to Ms. Stokesberry at  
6 approximately 7:10 a.m., with a much more menacing tone, which states: “You’re not  
7 tone death so don’t ignore me. Not either.” [Stokesberry Decl., at ¶5, and **Exhibit B**  
8 thereto.]

9 As per usual, both emails were sent from the [proreults411@gmail.com](mailto:proreults411@gmail.com) email  
10 address, which infringes on Fitness’ federally protected trademark, Pro Results.

11 Given the fact that Alspaugh has now stolen property (keys) and assaulted  
12 Fitness employee Mr. Roque on November 6th, and sent a threatening email to Ms.  
13 Stokesberry on November 7th, Fitness believes criminal charges against Alspaugh are  
14 appropriate, if not overdue, due to the escalation in her conduct.

15  
16 DATED: November 7, 2023

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17  
18 BY: \_\_\_\_\_

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